

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

ANNA MARIA THOMAS, LEVERETT HOLMES, JOSEFINA CRUZ,  
BRIAN SALAZAR, DAVID PAKTER, PAUL SANTUCCI

On behalf of all persons similarly situated pedagogues  
Or tenured educational personnel unfairly brought up  
on 3020-a Disciplinary Charges since the 2002  
abolishment of the NYC Board of Education and  
subjected to unlawful confinement in Teacher  
Reassignment Centers a/k/a Rubber Rooms,

Plaintiffs,

-against-

ECF CASE: No.  
09-5167 (SLT)(RLM)

**PLAINTIFFS'**  
**FIRST SET OF**  
**INTERROGATORIES**

NEW YORK CITY DEPARTMENT OF EDUCATION  
f/k/a BOARD OF EDUCATION OF THE CITY  
SCHOOL DISTRICT OF THE CITY OF NEW YORK;

JOEL I. KLEIN, in his official capacity as Chancellor of the  
CITY SCHOOL DISTRICT OF THE CITY  
OF NEW YORK and individually;

LAWRENCE BECKER, in his official capacity as  
Chief Executive Officer DIVISION OF HUMAN  
RESOURCES and individually;

PHILIP CROWE, in his official capacity as  
HUMAN RESOURCES DIRECTOR, and individually;

JUDITH RIVERA, in her official capacity as DEPUTY  
HUMAN RESOURCES DIRECTOR and individually;  
Defendants.

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1. For every NYC Public High School, Middle School and Elementary School, by Community School District, identify the length of the tenure of the Principal, whether the Principal was trained at the Principals' Leadership Academy, the age and race of the Principal and the number of teachers each Principal removed from the school and sent to a Teacher Reassignment Center ("TRC") by year since 1995 for: (i) Misconduct (ii) Incompetence, The age, sex, and race of the teachers removed

2. If a Principal has been in a school for less than 15 years, give the same information for the previous Principal and all Principals since 1995. Identify the years in which there was a change in Principal.

3. For each school that has removed teachers to a TRC, give the name of the Principal, give the year that Principalship began, the number of African-American Teachers and Assistant Principals when Principal arrived, the number of African-American Teachers today, the size of the school's faculty, how many teachers were removed to TRC's by year and how many African American teachers were removed to the TRC., What is the per centage of African American teachers in the school for each of the What is the race of the Principal?.

4. Provide the number of Teachers taken to hospitals in ambulances at TRC's and or who died while in service at a TRC and the year AND trc for each incident..

5. Provide the number of Teachers in each TRC for each year since 1995 for  
(i) Misconduct (ii) Incompetence (iii) Outside Arrest (iv) Other.

6. Provide the number of teachers assigned to a TRC without ever being formally charged, the length of time they stayed in the TRC and the name of the school they were sent from.

7. Provide a listing of all TRC's and give the census for each from 1995 until the present.

8. Provide the number of ATR's for 1995 until the present and those who had charges pending who were regular teachers but became ATR's because they were reassigned.

9. Provide the number of teachers who went through a 3020-a, resigned prior to or during the 3020-a, made settlements other than resignations, made settlements without going through the 3020-a and were subsequently terminated providing the settlement agreement along with the specifications of the charges for each of the herein types of settlements.

10. Provide the number of teachers who went through a 3020-a, resigned prior to or during the 3020-a, made settlements other than resignations, made settlements without going through the 3020-a and were subsequently terminated providing the settlement agreement along with the specifications of the charges for each of the herein types of settlements.

11. For each teacher removed from the school and sent to a TRC provide the name, race, age and salary of the teacher and the name, age, race and salary of the teacher used to replace them.

13. Categorized from 1995 to present all 3020-a cases by year, number of cases in each category and outcome for (i) exoneration (ii) suspension (3) fine (iv) reprimand (v) termination. Categories being (i) incompetency (ii) insubordination (iii) verbal/Physical abuse (iv) times heet issue (v) inappropriate sexual behavior (vi) absences/latenesses (vii) mishandling of school funds (viii) other. Specify other and provide 3020-a Specifications.

14. For each Arbitrator on the permanent panel provide the name, length of service, address. For those beyond commuting distance what is the maximum daily allowance given to each for hotel, cabs, meals, tips, travel accommodations such as first or business class, the maximum amount on travel expenses the DOE will allow for each and whether there is a maximum distance or train or plane ticket fee beyond which DOE will not pay their expenses from 1995 to the present.

15. In the NY Times on March 1, 2000, Acting Chancellor Levy is quoted as saying that Arbitrators routinely refused to schedule consecutive hearing days although required by law and often worked less than a full day they billed for. More recently it appears that Arbitrators work for NYC only 54 days a year. Please reconcile these 2 statements and provide the number

of days each arbitrator on the permanent panel worked and the amount of money earned in fees and in expenses for each Arbitrator.

Dated: New York, New York  
June 10, 2010

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By: \_\_\_\_\_s/\_\_\_\_\_

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Joy Hochstadt (JH0935)